

**FAX COVER SHEET**# OF PAGES 3  
(INCLUDING COVER)TO: John Heyer DATE: 2-8-05COMPANY: Comm for PurchaseFAX: (703) 603 0655 PHONE: ( )FROM: Alan Wingrove

COMPANY: DELAWARE INDUSTRIES FOR THE BLIND

FAX: (302) 255-4442

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☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Recycle**REMARKS:**Delaware Industries for the  
Blind Comments on proposed  
rulemaking

STATE OF DELAWARE  
DIVISION FOR THE VISUALLY IMPAIRED  
BIGGS BUILDING, 1901 N. DUPONT HIGHWAY, NEW CASTLE, DELAWARE 19720  
PHONE: 302 - 255 - 9855  
FAX: 302 - 255 - 4442



February 4, 2005

President's Committee for Purchase From People  
Who are Blind or Severely Disabled  
1421 Jefferson Davis Highway  
Jefferson Plaza 2, Suite 10800  
Arlington, VA 22202-3259  
Attn: Mr. John Heyer; Janet Yandik

Ms. Katherine Astrich, Policy Analyst  
Office of Management and Budget  
Office of Information and Regulatory Affairs  
Eisenhower Executive Office Building  
725-17<sup>th</sup> Street, N.W.  
Washington, DC 20502

Dear Sir or Madam:

Delaware Industries for the Blind is a State Agency, part of the Division for the Visually Impaired, Delaware Department of Health and Social Services. DIB has a proud history of providing employment to blind and visually impaired men and women of Delaware. As such, we can trace our roots back to the year 1909 when we were founded. Throughout what has been almost a century, we have had the privilege of participating with many agencies and organizations that share a similar mission or goal. Important among this is our affiliation with National Industries for the Blind and membership in the National Association of Employment of People Who Are Blind.

As an agency that has produced Skilcraft and JWOD products for many years, we have committed to following the rules and regulations as laid down by the Committee. However, in review, we find the new certifications required by the Committee's proposed rulemaking, inappropriate duplication and unnecessary. While we appreciate and share the concerns of the Committee, regarding the action of a few unscrupulous Agencies, these proposed changes are ill advised. The type of oversight and intervention the

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Committee proposes casts a shadow over the thousands of hard working dedicated and committed Board Members who do a tremendous job of overseeing and guiding the individual agencies for which they are responsible.

The Committee's proposed changes based on the isolated instances of abuse is an over reaction which would negatively affect the overwhelming majority of agencies who operate in an ethical and desirable manor.

We feel these proposed changes exceed the role and authority of the Committee as outlined in the JWOD Act. It is the responsibility of the Agency's Board, given under federal law to govern their not-for-profit agency. That the Committee's interference in this process is necessary. We would therefore urge the Committee not to adopt these regulations. We do not believe that they are in the best interest of the JWOD program. We feel they would provide no improvement with regard to their intent but would be cause to sidetrack and negatively affect our goal of providing desirable employment for the blind and disabled individuals through our country.

Sincerely,



Alan Wingrove  
General Manager

AW/bg